

1 THE HONORABLE ROBERT J. BRYAN
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7 **UNITED STATES DISTRICT COURT**
8 **WESTERN DISTRICT OF WASHINGTON AT TACOMA**

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10 UGOCHUKWU GOODLUCK
11 NWAUZOR, FERNANDO AGUIRRE-
12 URBINA, individually and on behalf of
13 all those similarly situated,

14 Plaintiff and counter-defendants,

15 v.

16 THE GEO GROUP, INC., a Florida
17 corporation,

18 Defendant and counter-plaintiff.

19 Case No.: 3:17-cv-05769-RJB
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21 STIPULATED MOTION TO FILE
22 ROBERTO VALDEZ'S REPORT UNDER
23 SEAL

24 NOTED: JULY 26, 2018
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26 **STIPULATED MOTION TO FILE UNDER SEAL**

27 The parties move this Court pursuant to LCR 5(g) and LCR 10(g) for an Order
28 permitting GEO to file a report authored by Roberto Valdez, Ph.D., licensed mental health
29 counselor, under seal. The report, attached at Exhibit A under seal, addresses plaintiff
30 Fernando Aguirre-Urbina's mental health status and treatment recommendations as of
31 December 24, 2014. GEO offers the report in support of its response opposing class
32 certification. Plaintiff objects to filing this record in open court and stipulates to filing the
33 document under seal without waiving the right to contest the relevance of the document.

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35 STIPULATED MOTION TO FILE UNDER SEAL
36 VALDEZ REPORT -
37 3:17-cv-05769-RJB

1 GEO does not oppose filing the Valdez report under seal at this time because the
2 content contains mental health information that GEO relies upon to support dismissal of class
3 claims. If dismissed, plaintiff's private mental health information need not be made public.
4 Plaintiff's privacy interests in the content of the report outweighs the public interest in viewing
5 the report at this time. The report was previously filed under seal in conjunction with
6 plaintiff's separate action seeking habeas corpus relief that was denied: ECF Case No.: 3:16-
7 cv-05935-RJB-RJC Dkt. 3 at 5 Appendix A - Mental Health Evaluation.

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10 Dated this 26th day of July, 2018.

11 III Branches Law, PLLC

12
13 Joan K. Mell, WSBA No. 21319
14 Attorney for The GEO Group, Inc.

15 Law Office of R. Andrew Free

16 R. Andrew Free

17
18 Andrew Free
19 Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I, Joseph Fonseca, hereby certify as follows:

I am over the age of 18, a resident of Pierce County, and not a party to the above action.

On July 26, 2018, I electronically filed the above GEO's Motion to File Roberto Valdez's Motion Under Seal, with the Clerk of the Court using the CM/ECF system and served via Email to the following:

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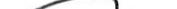
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I certify under penalty of perjury under the laws of the State of Washington that the above information is true and correct.

DATED this 26th day of July, 2018 at Fircrest, Washington.


Joseph Fonseca, Paralegal

STIPULATED MOTION TO FILE UNDER SEAL
VALDEZ REPORT -
3:17-cv-05769-RJB

Exhibit A
FILED UNDER SEAL
Fernando Aguirre-Urbina's Mental Health Records